

UNITED STATES BANKRUPTCY COURT
for the Eastern District of Pennsylvania

In re	:	Case No. 19 - 12098
Angel L. Granby	:	(Chapter 13)
Debtor.	:	
	:	Hon. Eric L. Frank
	:	

Debtor's Motion to Approve Mortgage Modification

AND NOW, comes Debtor, Angel L. Granby, by and through her attorney, Ronald G. McNeil, Esquire, hereby moves for approval of this loan modification, and, as reasons therefor, states as follows:

1. Debtor executed a Mortgage and Note on August 24, 2001 in the amount of \$64,452.00 for the real property located at 840 Kenmore Road Philadelphia, PA 19151-3311 ("the Property").
2. On January 9, 2018, Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
3. Debtor has applied for a loan modification with her mortgage company, U.S. Bank, N.A., Trustee for Pennsylvania Housing Finance Agency ("PHFA").
4. On or about February 10, 2022, Debtor was offered and executed this Loan Modification Agreement on March 9, 2022.
5. This loan modification has been approved contingent upon Bankruptcy Court approval. A true and accurate copy this Agreement is attached hereto and marked as Exhibit "A."
6. The terms of this Agreement are as follows: the new principle balance is \$106,150.84, with an interest rate of 3.5%. Monthly payments of principal and interest with escrow began on April 1, 2022 in the amount of \$746.52.

7. Approval and recording (if applicable) of this Agreement shall not constitute a violation of the Automatic Stay.
8. The parties may communicate to the extent necessary to comply with applicable non-bankruptcy law.

WHEREFORE, Debtor respectfully requests that this Honorable Court approve this Loan Modification Agreement and to order such other and further relief as is just and proper.

Respectfully submitted,

/s/ Ronald G. McNeil
Ronald G. McNeil, Esquire
Attorney for Debtor
DATE: May 10, 2022
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